

**-EXHIBIT 3-**

**Joseph Moretti**  
**December 7, 2017**

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5 Civil Action No. 4:15-cv-06314-YGR

7 ABANTE ROOTER AND PLUMBING, INC., \*  
8 MARK HANKINS, and PHILIP J. CHARVAT, \*  
individually and on behalf of all \*  
others similarly situated, \*

16 DEPOSITION OF: JOSEPH MORETTI  
17 CATUOGNO COURT REPORTING SERVICES, INC.  
18 155 South Main Street, Suite 201  
19 Providence, Rhode Island

20 December 7, 2017 10:03 a.m.

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1           A.     His knowledge of the business.

2           Q.     Was Jasit Gotra aware that Mr. Crins was  
3     your business partner?

4                   MS. SCHUCHARDT: Objection to form.

5           A.     I believe so.

6           Q.     And how do you know that?

7           A.     I don't. I'm not sure, I mean, I believe  
8     that he was.

9           Q.     All right. I'm going to show you some  
10    documents that were produced to us in this  
11    litigation.

12           MS. MURRAY: Do you want to take a break?

13           MR. BRODERICK: Yeah, why don't we take a  
14    break. Yes.

15

16                   (Short break was at 10:51 a.m.)

17

18                   (Back on at 10:54 a.m.)

19

20           Q.     I'm going to show you documents that were  
21    produced in this case marked Exhibit 144 Nationwide  
22    10. So do you recognize this document?

23           A.     No.

24           Q.     This was a document that was produced by

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1       you in response to that subpoena.

2           A.     It's a bunch of numbers. I have no idea,  
3     that could be anything.

4           Q.     Did you log onto the Ytel system; would  
5     it show you call logs of calls that your, that  
6     Nationwide had made?

7           A.     Would Ytel show me calls that Nationwide  
8     had made? Absolutely, yes.

9           Q.     So you could log onto the system and see  
10    outbound calls, correct?

11          A.     Yes.

12          Q.     And does this look like that, because  
13    this something that we got from you in response to  
14    that subpoena?

15          A.     It may have been but I don't recall.  
16    There's nothing familiar about the document.

17          Q.     Do you recognize -- you don't know  
18    recognize anything about this? Does the format at  
19    least look familiar to what the Ytel system did look  
20    like when --

21          A.     It looks familiar.

22          Q.     And you had an account with Ytel, right?

23          A.     I think we've already established that.

24          Q.     What did you do when you got that

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1 subpoena that you looked at earlier?

2 A. I don't recall, that was years ago.

3 Q. It was in 2016?

4 A. Years ago.

5 Q. It was a year ago. And you don't  
6 remember producing documents to Mr. Paronich in this  
7 case?

8 A. I don't recall what those documents were,  
9 no.

10 Q. Do you remember what your account number  
11 was with Ytel?

12 A. Not even close.

13 Q. Do you remember your user name with him?

14 A. No, sir.

15 Q. What does it mean for you that you were  
16 an independent business operator of Alliance?

17 A. Independent business operator of  
18 Alliance. I don't know what that means.

19 Q. Look at Exhibit 146. Do you recognize  
20 that document?

21 A. Yes, sir.

22 Q. And it says "Alliance Security IBO  
23 Agreement"?

24 A. Yes, sir.